



August 26, 2014

Chairman Tom Wheeler
Tom.Wheeler@fcc.gov

22645 Grand Street
Hayward, CA 94541

510.582.1460 Phone
510.582.6523 Fax

Dear Chairman Wheeler,

Eden Housing is writing to respectfully urge you and your colleagues at the Federal Communications Commission (FCC) to secure a public benefit from the proposed Comcast acquisition of Time Warner Cable (TWC) and trade of service territory with Charter Communications in the form of the 5 Recommendations below to ensure acceptable performance on the Comcast affordable offer called Internet Essentials (CIE):

1. Include All Low-Income Households, specifically seniors and people with disabilities
2. Set Performance Goals
3. Capitalize an Independent Fund and Coordinate with States
4. Establish an Advisory Oversight Committee
5. Offer Stand-Alone Internet Service

There are a significant number of issues at stake for California with this corporate consolidation and there must be a public benefit for California consumers, given the magnitude of the market share controlled by Comcast if approved – for example, 87% of all California students on free-or-reduced lunch will reside in Comcast service areas. Although CIE has a laudatory price-point, there is ample evidence of all the problems that have plagued the subscription process, resulting in just 11% of the eligible population being signed up during the last 3 years.

We've found that the slow sign up process is a major barrier to getting families connected. At best the process takes 3-4 weeks but in many cases it can take 6 weeks from the time they contact Comcast to connection. This lag time is unacceptable and has been a huge deterrent to our residents..

Today, statewide broadband adoption at home in California is at 75%, leaving 25% of the population farther and farther behind. There must be an affordable broadband rate widely available to the nearly 10 million Californians who remain offline, especially students who live in low-income neighborhoods and attend low-performing schools. These students must have a better opportunity to learn and become productive members of society if California is going to be globally competitive.

For seniors and people with disabilities, the gap is even larger; only 47% of adults 65 or older and 59% of people with disabilities have access to broadband at home. As more and more government agencies are moving to paperless systems these populations are left without access to basic needs, including housing and income. For example, in order to reside in affordable housing, seniors and people with disabilities must provide income verification from the Social Security Administration annually. In most cases this information must be obtained through the Social Security's website. Similarly, Social





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Security no longer issues paper checks making access to income virtually impossible without internet access.

Additionally, many seniors and disabled people have limited mobility, making it hard to get out of their homes. This isolation puts them at high risk for depression. Research shows that computer usage among seniors reduces the risk of depression by more than 30%.

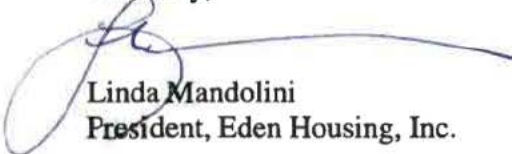
These are just a few of the many reasons the CIE program should be expanded to include the senior and disabled populations. It is clear that there is a need for affordable internet and in light of the proposed merger, Comcast has the means to meet this need.

We note that the California PUC in its Comcast –TWC merger docket, Application No. (A.) 14-04-013, will be exploring the issue also, according to its Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge: “How would the Merger benefit California consumers? For example, will the merger benefit low income outreach and adoption of broadband services that are accessible, affordable, and equitable in a manner that is enforceable and will help close the digital divide? Will the merger help educate consumers on using computers and the internet when service is provided? Will the merged entity offer standalone internet access and make sure consumers are aware of this offer?”¹ We recommend the FCC accept data from the CPUC’s merger docket on this point.

Should the FCC decide to approve this merger transaction, Eden respectfully requests that the FCC take this opportunity to mandate Comcast to greatly improve its program, and to be accountable for delivering a functional, results-driven program with measurable goals showing a real public benefit to low-income persons in its service areas.

In short, the FCC should take a more active oversight role in ensuring that the benefits of this program are delivered to low-income families in a more meaningful way. Absent specific performance goals, it is our experience that Comcast has failed to put enough outreach staff, advertising and operational resources on the program to deliver adequate levels of performance.

Sincerely,



Linda Mandolini
President, Eden Housing, Inc.

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Gigi B. Sohn, Special Counsel for External Affairs for Chairman Wheeler
gigi.sohn@fcc.gov

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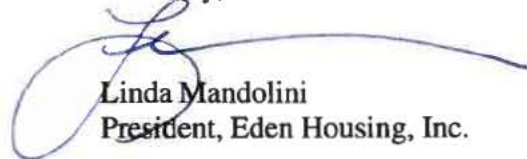
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Commissioner Jessica Rosenworcel
Jessica.Rosenworcel@fcc.gov

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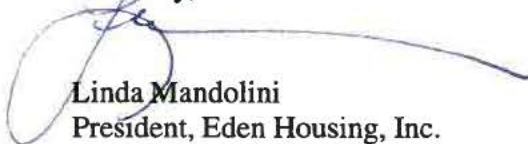
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Commissioner Ajit Pai
Ajit.Pai@fcc.gov

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Commissioner Michael O'Rielly
Mike.O'Rielly@fcc.gov

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Rebekah Goodheart – Wireline Advisor for commissioner Clyburn
Rebekah.Goodheart@fcc.gov

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Dear Rebekah Goodheart,

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Nicholas Degani, Legal Advisor, Wireline for Commissioner Pai
nicholas.degani@fcc.gov

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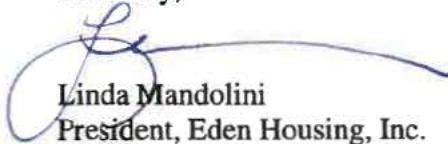
These are just a few of the many reasons the CIE program should be expanded to include the senior and disabled populations. It is clear that there is a need for affordable internet and in light of the proposed merger, Comcast has the means to meet this need.

We note that the California PUC in its Comcast –TWC merger docket, Application No. (A.) 14-04-013, will be exploring the issue also, according to its Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judge: “How would the Merger benefit California consumers? For example, will the merger benefit low income outreach and adoption of broadband services that are accessible, affordable, and equitable in a manner that is enforceable and will help close the digital divide? Will the merger help educate consumers on using computers and the internet when service is provided? Will the merged entity offer standalone internet access and make sure consumers are aware of this offer?”¹ We recommend the FCC accept data from the CPUC’s merger docket on this point.

Should the FCC decide to approve this merger transaction, Eden respectfully requests that the FCC take this opportunity to mandate Comcast to greatly improve its program, and to be accountable for delivering a functional, results-driven program with measurable goals showing a real public benefit to low-income persons in its service areas.

In short, the FCC should take a more active oversight role in ensuring that the benefits of this program are delivered to low-income families in a more meaningful way. Absent specific performance goals, it is our experience that Comcast has failed to put enough outreach staff, advertising and operational resources on the program to deliver adequate levels of performance.

Sincerely,



Linda Mandolini
President, Eden Housing, Inc.

¹ Scoping Memo and Ruling of Assigned Commissioner and Administrative Law Judge, in re Joint Application of Comcast Corp., Time Warner Cable Inc., Time Warner Cable Information Services (California), LLC and Bright House Networks Information Services (California), LLC for Expedited Approval for the Transfer of Control of Time Warner Cable Information Services (California), LLC (U6874C); and the Pro Forma Transfer of Control of Bright House Networks Information Services (California), LLC (U6955C), to Comcast Corp. Pursuant to California Public Utilities Code Section 854(a), in A. 14-04-013 (filed Apr. 11, 2014), at 13 (“CPUC Scoping Memo”).



August 26, 2014

Commissioner Mignon Clyburn
Mignon.Clyburn@fcc.gov

22645 Grand Street
Hayward, CA 94541

510.582.1460 Phone
510.582.6523 Fax

Dear Commissioner Clyburn,

Eden Housing is writing to respectfully urge you and your colleagues at the Federal Communications Commission (FCC) to secure a public benefit from the proposed Comcast acquisition of Time Warner Cable (TWC) and trade of service territory with Charter Communications in the form of the 5 Recommendations below to ensure acceptable performance on the Comcast affordable offer called Internet Essentials (CIE):

1. Include All Low-Income Households, specifically seniors and people with disabilities
2. Set Performance Goals
3. Capitalize an Independent Fund and Coordinate with States
4. Establish an Advisory Oversight Committee
5. Offer Stand-Alone Internet Service

There are a significant number of issues at stake for California with this corporate consolidation and there must be a public benefit for California consumers, given the magnitude of the market share controlled by Comcast if approved – for example, 87% of all California students on free-or-reduced lunch will reside in Comcast service areas. Although CIE has a laudatory price-point, there is ample evidence of all the problems that have plagued the subscription process, resulting in just 11% of the eligible population being signed up during the last 3 years.

We've found that the slow sign up process is a major barrier to getting families connected. At best the process takes 3-4 weeks but in many cases it can take 6 weeks from the time they contact Comcast to connection. This lag time is unacceptable and has been a huge deterrent to our residents..

Today, statewide broadband adoption at home in California is at 75%, leaving 25% of the population farther and farther behind. There must be an affordable broadband rate widely available to the nearly 10 million Californians who remain offline, especially students who live in low-income neighborhoods and attend low-performing schools. These students must have a better opportunity to learn and become productive members of society if California is going to be globally competitive.

For seniors and people with disabilities, the gap is even larger; only 47% of adults 65 or older and 59% of people with disabilities have access to broadband at home. As more and more government agencies are moving to paperless systems these populations are left without access to basic needs, including housing and income. For example, in order to reside in affordable housing, seniors and people with disabilities must provide income verification from the Social Security Administration annually. In most cases this information must be obtained through the Social Security's website. Similarly, Social





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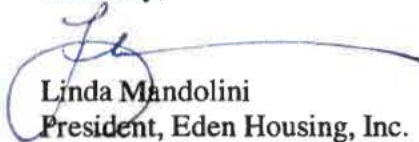
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August 26, 2014

Amy Bender, Legal Advisor- Wireline for Commissioner O'Rielly
amy.bender@fcc.gov

22645 Grand Street
Hayward, CA 94541

510.582.1460 Phone
510.582.6523 Fax

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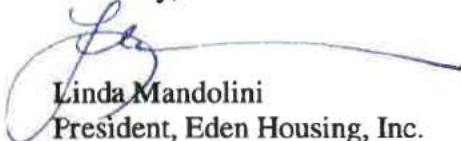
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